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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 PAZIA LONDON,
10
11 Plaintiff,

12 v.

13 FMMR INVESTMENTS, INC. d/b/a
14 RAPID CASH,
15 Defendant.

Case No.: 2:19-cv-01794-KJD-BNW

STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE
DISCOVERY AND DISPOSITIVE
MOTION DEADLINES

(FIRST REQUEST)

17
18 Pursuant to LR 26-4, plaintiff Pazia London ("Plaintiff") and defendant FMMR
19 Investments, Inc. d/b/a Rapid Cash ("Defendant") (together, the "Parties"), stipulate to
20 extend the discovery and dispositive motion deadlines by sixty (60) days as follows:

21 **A. Discovery completed.**

22 1. The Parties exchanged initial disclosures on January 8 and 17, 2020, pursuant to
23 which they produced numerous documents at issue in this case.

24 2. Plaintiff served written discovery requests on Defendant on February 24, 2020,
25 responses to which are due on April 8, 2020.

26 3. Defendant served written discovery requests on Plaintiff on March 24, 2020,
27 responses to which are due on April 24, 2020.
28

1 **B. Discovery to be completed.**

2 1. In addition to and as a result of the outstanding written discovery requests stated
3 above, the Parties anticipate supplemental disclosures of documents and/or witnesses.

4 2. Plaintiff intends to take the deposition of Defendant's corporate representative.

5 3. Defendant intends to take the deposition of Plaintiff.

6 **C. Reasons discovery not completed and good cause for extension.**

7 The truly unusual circumstances related to the Coronavirus Pandemic have caused
8 delays in communication with clients and will impact the Parties' abilities to schedule and
9 hold depositions within the time originally allotted for discovery.

10 Federal Rule of Civil Procedure 6(b) provides trial courts with the authority to extend
11 time periods. The Parties believe that good cause exists to extend the discovery deadlines
12 as they have diligently prosecuted this case and additional discovery is required for the
13 parties to adequately prepare for the trial. Further, health concerns related to the
14 Coronavirus pandemic have created an unusual and unforeseen impact on the depositions
15 of the Parties.

16 **D. Proposed deadlines.**

17 Thus, the Parties respectfully request that the discovery deadline of May 5, 2020, be
18 extended by sixty (60) days to July 6, 2020, and that the corresponding deadline to file
19 dispositive motions be extended by sixty (60) days to August 5, 2020. This request will not
20 affect any other deadline in the Court's Discovery Plan and Scheduling Order.

21 Pursuant to LR IA 6-1, this is the first request for an extension of these deadlines. This
22 stipulation is not filed for any improper purpose and is not requested for delay. The
23 requested extension will not affect the trial date or any other deadlines in the Court's
24 Discovery Plan and Scheduling Order other than those mentioned above. Further, none of
25 the parties will be prejudiced by an extension of these deadlines.

26 **IT IS SO ORDERED**

27 **DATED: April 06, 2020**

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BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

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